

BRENDA K. BAUMGART, OSB No. 992160
brenda.baumgart@stoel.com
SOPHIE SHADDY-FARNSWORTH, OSB No. 205180
sophie.shaddy-farnsworth@stoel.com
STOEL RIVES LLP
760 SW Ninth Avenue, Suite 3000
Portland, OR 97205
Telephone: 503.224.3380
Facsimile: 503.220.2480

Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

ALISON LAVELLE-HAYDEN an
Individual; AUDREY ROGNESS, an
Individual; THERESA SERINI, an Individual;
KALINA M. SOLMONSON, an Individual;
and ROMAN ROMANYUK, an Individual,

Plaintiffs,

v.

LEGACY HEALTH, a Public Benefit
Corporation, and DOES 1 THROUGH 50,
Inclusive,

Defendants.

Case No.: 3:22-cv-01752-IM

JOINT STATUS REPORT

Pursuant to Federal Rule of Civil Procedure 26(f), the parties conducted a discovery conference on March 30, 2023. They submit this discovery plan and proposed case schedule for the following cases pursuant to FRCP 26(f), Local Rules 16 and 26, and the Court's March 20, 2023 Order (Dkt. 12).

A. JOINT STATUS REPORT AND DISCOVERY PLAN

1. Nature and Complexity of Case: On November 9, 2022, Plaintiffs filed a Complaint against Legacy Health (“Legacy”) and 50 John Does alleging Title VII and state-law religious discrimination claims related to Plaintiffs’ requests for a religious exemption from the COVID-19 vaccination requirement. On November 16, 2022, Plaintiffs filed a First Amended Complaint and added Roman Romanyuk as a plaintiff. The parties agree that this case is not complex in terms of the number of documents or the legal issues. The parties do not anticipate that this will require greater than normal time provided to complete discovery and trial.

2. Deadline for Joining Additional Parties: Counsel for both parties are also involved in three separate lawsuits filed in this District Court. *See Haeseker v. Legacy Health*, 3:23-CV-00047-JR; *Hailey et al. v. Legacy Health*, 3:23-CV-00149-IM; *Quinn v. Legacy Health*, 3:23-CV-00331-JR. Plaintiffs’ counsel has notified Defendant’s counsel that more such lawsuits will be filed in the coming months. In an effort to streamline discovery, Defendants have agreed not to oppose any request from Plaintiffs to consolidate these cases for purposes of discovery only, with the understanding that Defendants will seek to bifurcate the cases for trial (and Plaintiffs will not oppose that request).

3. Consent to a U.S. Magistrate Judge: There is not full consent to the use of a Magistrate Judge.

4. Alternative Dispute Resolution: The parties will evaluate whether mediation would help resolve this case after discovery.

5. Proposed Discovery Plan:

(a) The parties exchanged LR 26-7 initial discovery on March 20, 2023 and March 23, 2023.

(b) The parties anticipate taking discovery in accordance with the applicable civil rules and case law on subjects pertinent to their claims and/or defenses.

(c) The parties anticipate seeking discovery of electronically stored information, including emails, as well as documents generally kept in the usual course of Defendant's business. The parties do not anticipate the discovery of electronically stored information to present unique or complex issues. The parties agree to work collaboratively according to the particular needs of the request regarding the form of request and production of ESI.

(d) The parties do not anticipate that privilege issues will play a larger role in this case than they typically do in similar cases.

(e) The parties do not agree at this time to limiting discovery beyond the limits imposed by the applicable federal and/or local rules. The parties agree to confer and work cooperatively where possible regarding this issue as discovery progresses.

B. PROPOSED CASE SCHEDULE

<i>Event</i>	<i>Deadline</i>
Exchange of Initial Disclosures	See A.4.(a).
Discovery Close	November 30, 2023
Expert Discovery Close	January 26, 2024
Dispositive Motions Deadline	March 31, 2024
Trial date	The parties anticipate that the case will be ready for trial by October/November 2024.

DATED: March 30, 2023 STOEL RIVES LLP

s/ Sophie Shaddy-Farnsworth
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 Telephone: 503.224.3380
 Attorneys for Defendant Legacy Health